

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA LLC,  
F/K/A SYNTHESIS FILMS LLC; LAURA  
RICCIARDI; AND MOIRA DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484**

**STIPULATION**

In the interest of clarifying any applicable response deadlines, the parties, by their respective attorneys, hereby stipulate that, in light of the Court's rulings from the bench at the hearing held in this matter on December 19, 2019, Defendants need not answer the first Amended Complaint. The parties further stipulate that Defendants Chrome Media LLC, Laura Ricciardi, and Moira Demos need not respond to the Second Amended Complaint unless and until the Court denies their pending motion to dismiss the first Amended Complaint and that Defendant Netflix, Inc. may have sixty (60) days from the filing of the Second Amended Complaint as a separate docket entry to answer or otherwise respond to the Second Amended Complaint. Nothing in this Stipulation is intended as a waiver of any procedural or substantive argument that Plaintiff may raise in opposition to any Defendant's submission of a Rule 12 motion in response to the Second Amended Complaint, regardless of whether such motion is based on the same or different grounds as any Defendant's prior motions in these proceedings.

Dated: January 7, 2020.

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Dated: January 7, 2020.

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Media LLC; Laura Ricciardi; and Moira Demos*